1 2 3 4 5	Rachael D. Lamkin (SBN 246066) Karan Singh Dhadialla (SBN 296313) BAKER BOTTS L.L.P. 101 California Street, Suite 3200 San Francisco, California 94111 Phone: (415) 291-6200 Fax: (415) 291-6300 rachael.lamkin@bakerbotts.com karan.dhadialla@bakerbotts.com		
6	Attorneys for Defendant		
7	NETFLIX, INC.		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	OAKLAND DIVISION		
11			
12	LAURI VALJAKKA,	Case No.: 4:22-cv-01490-JST	
13	Plaintiff,	DECLARATION OF RACHAEL D.	
14	V.	LAMKIN ISO NETFLIX, INC.'S UNOPPOSED LOCAL RULE 7-11 ADMINISTRATIVE MOTION FOR CLARIFICATION REGARDING RULE	
15	NETFLIX, INC.,		
16	Defendant.	45 DISCOVERY	
17		Judge: Hon. Jon S. Tigar	
18   19   20   21   22   23   24   25   26   27	I, Rachael D. Lamkin, declare as follows:  1. I am a partner with the law firm of Baker Botts L.L.P. and counsel of record for Defendant Netflix, Inc. in the above-captioned matter.  2. I am admitted to practice in all state and federal courts in California, federal courts in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal Circuit the International Trade Commission, the Court of International Trade, and this Honorable Court.  3. I have personal knowledge of the facts stated herein.  4. I make this Declaration in support of Netflix's Unopposed Local Rule 7-18 Administrative Motion for Clarification Regarding Rule 45 Discovery.		
28			
	DECL.OF R. LAMKIN ISO L.R. 7-11 MOT.	CASE No.: 4:22-CV-01490-JST	

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1	5. Attached as Exhibit A is a true and correct copy of Respondent Netflix, Inc.'s	
2	Opposition to Movant AiPi, LLC's Motion to Quash the Subpoena in AiPi, LLC v. Netflix, Inc., Cas	
3	No. 1:24-mc-00002-LMB-WEF (E.D. Va.), Dkt. No. 11.	
4	6. Attached as Exhibit B is a true and correct copy of the transcript of the Court's hearing	
5	on AiPi's Motion to Quash Netflix's Rule 45 subpoena, dated February 23, 2024. I have highlighten	
6	the relevant portions on pages 11, 12, and 15-16.	
7		
8	I declare under penalty of perjury under the laws of the United States of America and the States	
9	of California that the foregoing is true and correct.	
10		
11	Executed on this 26th day of February, 2024 in Sausalito, California.	
12		
13	By: <u>/s/ Rachael D. Lamkin</u> Rachael D. Lamkin	
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